Monte J. White and Associates Monte J. White American State Building 402 Cypress, Suite 310 Abilene, TX 79601 (325)673-6699 (325)672-9227 Fax

## IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF TEXAS ABILENE DIVISION

IN RE:

Kenneth Karl Hobbie 

§ Case No. 11-10178-RLJ-13

§

DEBTOR

## DEBTOR'S RESPONSE TO MOTION FOR RELIEF FROM AUTOMATIC STAY OF CitiMortgage, Inc.

## TO THE HONORABLE JUDGE OF SAID COURT:

Comes now Debtor in the above-titled cause and files this Response to Motion for Relief from Automatic Stay.

On October 1, 2013, Attorney for CitiMortgage, Inc., McCarthy, Holthus & Ackerman, LLP, filed a Motion for Relief from Automatic Stay, in response thereto, Debtor would show the following:

- 1. ADMIT
- 2. ADMIT
- 3. ADMIT
- 4. ADMIT
- 5. ADMIT
- 6. ADMIT
- 7. DENY
- 8. DENY
- 9. DENY
- 10. DENY
- 11. DENY
- 12. DENY

WHEREFORE, PREMISES CONSIDERED, Debtor prays that motion be denied in all respects, that the Court award reasonable and necessary attorney fees for the defense of this Motion and for such other and further relief to which they may be entitled.

Respectfully submitted,

## /s/Monte J. White Attorney for Debtor CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Response to Motions for Relief from Stay was served by ECF and/or mailed on October 2, 2013, to the following as indicated:

/s/Monte J. White
Attorney for Debtor

Movant: CitiMortgage, Inc.

3415 Vision Drive Columbus, OH 43219

Attorney for Movant: McCarthy, Holthus & Ackerman, LLP

P.O. Box 866668 Plano, Texas 75075

Trustee: Chapter 13 Trustee

Walter O'Cheskey 6308 Iola Ave. Lubbock, TX 79424

U.S. Trustee William T. Neary

1100 Commerce Street, Room 9-C-60

Dallas, TX 75242

Debtor: Kenneth Karl Hobbie

P.O. Box 211 Eagle, NE 68347